

Chan, Suilin

From: Ian Caffery <iancaffery1@gmail.com>
Sent: Wednesday, January 06, 2021 7:56 AM
To: Jon, Frank
Cc: Chan, Suilin; Dholakia, Umesh
Subject: Re: Pyrolysis

Thank you for your prompt response.

At present we are constructing and commissioning a new portable pyrolysis plant, we have a third party Laboratory conducting emission tests which we shall submit to EPA to ensure we are operating within the parameters required.

We work in many places across the world, your prompt response is fabulous and a breath of fresh air for us (excuse the pun), congratulations on providing an excellent service.

Kind Regards
Ian
00971522726857

On Tuesday, January 5, 2021, Jon, Frank <Jon.Frank@epa.gov> wrote:

Hi, I hope everything is well with you too.

With respect to air, the EPA does not have air regulations (or objections) specifically addressed to pyrolysis. However, depending on the potential to emit (PTE) of air emissions and the specific individual units at the proposed facility, you may want to look at the following federal regulations for potential applicability:

1. Prevention of Significant Deterioration of Air Quality (PSD) regulations – 40 CFR 52.21. Applies to sources with PTE of 100 tpy or 250 tpy of individual criteria air emissions depending on source category.
2. New Source Performance Standards (NSPS) - 40 CFR Part 60. Emissions standards for new, modified and reconstructed sources/facilities.
3. National Emissions Standards for Hazardous Air Pollutants (NESHAPS) – 40 CFR Part 61 and 40 CFR Part 63. Emissions standards for certain types of sources/units.

You will also need to contact PRDNER for local air regulations. Classifying this process either as renewable energy or recycled energy does not affect the applicability of these air regulations.

Sincerely,

Frank Jon, Environmental Engineer

Permitting Section

Air Programs Branch

USEPA – Region 2

From: Ian Caffery <iancaffery1@gmail.com>

Sent: Monday, January 4, 2021 4:51 PM

To: Jon, Frank <Jon.Frank@epa.gov>

Subject: Pyrolysis

Hi, I hope that this mail finds you well.

Myself and my colleagues are exploring the option of operating a pyrolysis plant/plants in Puerto Rico for recycling if used tyres and plastic. Does the EPA have any rules, regulations or objections to the use of pyrolysis. The object of our business is to recycle the waste items to create fuel oil which we intend to use in generators and sell the power produced to the business community.

Would EPA class this process as renewable energy or recycled energy, this appears to be a grey area as gas from landfill which is similar is classed as alternative renewable.

Regards

Ian Caffery

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